

UNITED STATES DISTRICT COURT

for the

District of Minnesota

UNITED STATES OF AMERICA)

v.)

KENJA OMAR-DEANGELO CARMICHAEL)

Case No. Mag. No. 14:MJ-11 (LIB)

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about December 31, 2013, in St. Louis County, in the State and District of Minnesota, defendant Kenja Omar-Deangelo CARMICHAEL, did by force, violence and intimidation, take from the person and presence of the victim teller approximately \$2,000, money which belonged to and was in the care, custody, control, management and possession of US Bank, located on West Superior Street, in Duluth, Minnesota, the deposits of which were then insured by the Federal Deposit Insurance Corporation, all in violation of Title 18, United States Code, Section 2113(a). I further state that I am a Special Agent with the Federal Bureau of Investigation (FBI) and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Sworn to before me and signed in my presence.

Date:

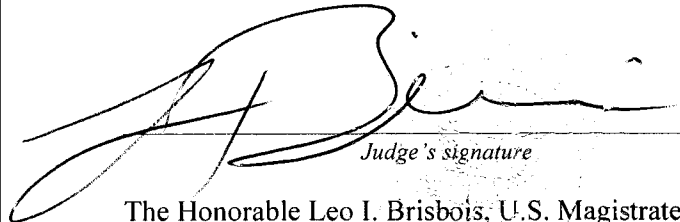
1/10/14

City and state: Duluth, MN


Complainant's signature

Timothy D. Ball, FBI Special Agent

Printed name and title


Judge's signature

The Honorable Leo I. Brisbois, U.S. Magistrate Judge

Printed name and title

SCANNED

JAN 23 2014

U.S. DISTRICT COURT DULUTH

STATE OF MINNESOTA)
)
COUNTY OF SAINT LOUIS)

ss. AFFIDAVIT OF TIMOTHY D. BALL

1. Your affiant, Timothy D. Ball, being duly sworn and under oath, deposes and states as follows:
2. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI). I have been a Special Agent of the FBI since February of 1997. I am currently assigned to the Duluth, Minnesota Resident Agency of the FBI. As a Special Agent of the FBI, my duties and responsibilities include conducting criminal investigations of individuals and entities for possible violation of Federal laws, including those laws found in Title 18 and Title 21, United States Code, including bank robbery.
3. This affidavit is made in support of a request for a criminal complaint and arrest warrant for KENJA OMAR-DEANGELO CARMICHAEL, date of birth XX/XX/1978, on grounds that he committed a violation of Title 18, United States Code, Section 2113(a) –Bank Robbery.
4. The facts and information contained in this affidavit are based upon my own investigation and observations and those of other agents and law enforcement officers involved in the investigation. All observations referenced below that were not made by me were related to me by the persons who made such observations. This affidavit is made for the purpose of establishing probable cause for the attached criminal complaint and arrest warrant and therefore contains only a

summary of relevant facts. It is not intended to include each and every fact and matter observed by me or known to the Government.

5. On December 31, 2013, at approximately 10:25a.m., the US Bank (hereafter referred to as "the Bank"), located on West Superior Street, Duluth, Minnesota was robbed by a lone black male. At approximately 10:28a.m., the Duluth Police Department was notified of an alarm at the Bank. Officers responded, and upon their arrival at the Bank, they were advised that a lone black male had entered the Bank. The suspect handed the victim teller a demand note which stated, "open up your drawer and count out 5,000 dollars on the counter NOW If you do not, 'I will shoot U The gun is in The BAG Pointing At you.'" The suspect left the demand note at the scene when he fled from the Bank.
6. On December 31, 2013, I interviewed victim teller #1. Victim teller #1 advised that he had seen the robber inside the vestibule area of the Bank where the ATM machine was located prior to the bank robbery. The robber entered the Bank and threw the demand note down on the counter. When victim teller #1 picked up the demand note, the robber told him "don't touch the button or I will shoot you." Victim teller #1 grabbed two (2) stacks of \$100s and showed the robber. Victim teller #1 told the robber that was all the \$100s he had. The robber told him, "that's ok" and took the money. The robber then told victim teller #1 again, "don't touch the button or I will shoot you." Victim teller # 1 described the robber as a black male, approximately 5'10"-5'11", with facial hair (mustache/goatee), wearing a dark colored baseball cap and a dark colored mid-thigh winter jacket.

7. Following the robbery, bank employees completed an audit of the victim teller drawer. According to the audit, the Bank suffered a loss of \$2,000 in United States currency. At the time of the robbery, the customer deposits at the Bank were federally insured by the Federal Deposit Insurance Corporation (FDIC).
8. Upon a review of the Bank's video surveillance footage, as well as video surveillance footage from the ATM, Duluth police officer Lukovsky and Duluth police investigator McShane identified the suspect in the robbery as KENJA OMAR-DEANGELO CARMICHAEL. Both Officer Lukovsky and Investigator McShane are familiar with CARMICHAEL from previous police encounters and other investigations involving CARMICHAEL. CARMICHAEL was previously convicted and sentenced for violations of federal gun and narcotic violations in 2005.
9. Later on December 31, 2013, an anonymous tipster contacted the Duluth Police Department and stated she/he had information about an individual known to him/her as "Jackpot" who wanted a ride to a bank in Duluth. The anonymous tipster, identified by the Duluth Police Department, stated he/she saw the news and the press release photograph and recognized the bank robbery suspect. (This individual has requested that her/his name remain anonymous.) The individual identified the suspect in the bank surveillance photograph as "Jackpot". Police records confirmed that CARMICHAEL has used an alias or nickname of "Jackpot".

10. Cooperating witness #2, working with Investigator McShane, contacted "Jackpot" at (901) 552-2044 and verified that it was "Jackpot" using this telephone number. Cooperating witness #2 stated he/she had seen the news and saw the press release of the bank robbery suspect. Cooperating witness #2 stated he/she recognized the bank robbery suspect and positively identified the suspect as "Jackpot".
11. Cooperating witness #3, working with Investigator McShane, was interviewed. Cooperating witness #3 stated he/she had saved two text messages from (901) 522-2044, which he/she knew to be used by "Jackpot". Text message #1, dated December 30, 2013 at 10:25a.m., stated as follows:

"hey, good morning can I give 20 to take me to my bank on Superior St by Curly's US Bank"

Text message # 2, dated December 31, 2013 at 10:54a.m., stated as follows:

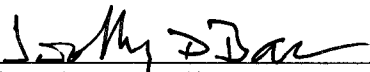
"hey, I'll give you 50 dollars if you come and get me now. I'm at 115 N 19Ave West Duluth."

- Cooperating witness #3 stated he/she had seen the news and saw the press release of the bank robbery suspect. Cooperating witness #3 stated he/she recognized the bank robbery suspect and positively identified the suspect as "Jackpot".
12. Cooperating witness # 4 told Investigator McShane that on December 31, 2013, he/she had received two telephone calls from "Jackpot". One of the telephone calls came at 10:31a.m. and the other telephone call came at 10:44a.m. Cooperating witness # 4 stated he/she thought "Jackpot" had called him/her for a ride. Cooperating witness # 4 stated he/she had seen the news and saw the press release of the bank robbery suspect. Cooperating witness # 4 stated he/she

recognized the bank robbery suspect and positively identified the suspect as "Jackpot".

13. Cooperating witness # 5 told Investigator McShane that on December 31, 2013, "Jackpot" had called her/him and asked for a ride. Cooperating witness # 5 stated he/she had seen the news and saw the press release of the bank robbery suspect. Cooperating witness # 5 stated he/she recognized the bank robbery suspect and positively identified the suspect as "Jackpot".
14. Based upon all of the above, your affiant believes there is probable cause that KENJA OMAR-DEANGELO CARMICHAEL, aka "Jackpot", date of birth xx/xx/1978, committed a violation of Title 18 United States Code, § 2113(a) - Bank Robbery, to wit: robbing the US Bank located on West Superior Street in Duluth, Minnesota on December 31, 2013, through the use of a handwritten demand note.

Further your affiant sayeth not.


Timothy D. Ball, Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before

me this 10 day of January, 2014.


The Honorable Leo I. Brisbois
United States Magistrate Judge